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6 Attorneys for Chapter 7 Trustee,  
A. CISNEROS

7  
8 UNITED STATES BANKRUPTCY COURT  
9 CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION

10 In re

11 SHAMICKA LAWRENCE,

12 Debtor.

Case No. 6:23-bk-15163-WJ

Chapter 7

**THIRD STIPULATION FOR EXTENSION  
OF DEADLINE TO OBJECT TO  
DISCHARGE**

[NO HEARING REQUIRED]

13  
14  
15 TO THE HONORABLE WAYNE E. JOHNSON, UNITED STATES BANKRUPTCY JUDGE,  
16 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

17 This stipulation (“Stipulation”) is entered into between Arturo M. Cisneros, in his capacity as  
18 Chapter 7 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Shamicka Lawrence  
19 (“Debtor”), Debtor, and the United States Trustee for the Central District of California, Region 16  
20 (“U.S. Trustee” and collectively, the “Parties”), with regard to the following:

21 **Recitals**

22 A. On November 3, 2023 (“Petition Date”), Debtor filed a voluntary petition under  
23 Chapter 7 of Title 11 of the United States Code, initiating the above-captioned bankruptcy case.  
24 Arturo M. Cisneros (previously defined as “Trustee”) was appointed as the Chapter 7 Trustee.

25 B. On May 8, 2024, Trustee concluded the meeting of creditors.

26 C. The current, stipulated extended deadline to object to discharge is June 5, 2024  
27 (“Discharge Deadline”).

28 D. The U.S. Trustee is in the process of scheduling a Rule 2004 examination of the

Debtor and has requested a further extension of the deadline to file an objection to Debtor's discharge. The U.S. Trustee has requested an examination date of August 22, 2024, and therefore requests that the deadline be extended to accommodate the Rule 2004 examination.

The Parties agree and STIPULATE as follows:

1. The deadline for Trustee and the U.S. Trustee to file an objection to discharge shall be further extended through and including September 5, 2024 ("Extended Deadline"). The Extended Deadline shall be applicable only to the Trustee and U.S. Trustee and no other party in interest.

2. The Stipulation is without prejudice to any further extensions of the deadline to object to discharge, to be made by further motion or stipulation.

3. This Stipulation may be executed in one or more counterparts and facsimile or electronic signatures may be used in filing this document with the Court.

Dated: May 31, 2024

MARSHACK HAYS WOOD LLP

By: /s/ Tinhong Mang

D. EDWARD HAYS  
TINHONG MANG  
Attorneys for Chapter 7 Trustee  
A. CISNEROS

Dated: May \_\_, 2024

UNITED STATES TRUSTEE FOR THE  
CENTRAL DISTRICT OF CALIFORNIA,  
REGION 16

By: (See next page for signature)

Everett L. Green  
Trial Attorney

Dated: May \_\_, 2024

By: (See next page for signature)

SHAMICKA LAWRENCE, Debtor

Debtor and has requested a further extension of the deadline to file an objection to Debtor's discharge. The U.S. Trustee has requested an examination date of August 22, 2024, and therefore requests that the deadline be extended to accommodate the Rule 2004 examination.

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Dated: May \_\_, 2024

MARSHACK HAYS WOOD LLP

By: (See previous page for signature)

D. EDWARD HAYS

TINHO MANG

Attorneys for Chapter 7 Trustee

A. CISNEROS

Dated: May 31, 2024

UNITED STATES TRUSTEE FOR THE  
CENTRAL DISTRICT OF CALIFORNIA,  
REGION 16

By: 

Everett L. Green

Trial Attorney

Dated: May \_\_, 2024

By: (See next page for signature)

SHAMICKA LAWRENCE, Debtor

1 Debtor and has requested a further extension of the deadline to file an objection to Debtor's  
2 discharge. The U.S. Trustee has requested an examination date of August 22, 2024, and therefore  
3 requests that the deadline be extended to accommodate the Rule 2004 examination.

4 The Parties agree and STIPULATE as follows:

5 1. The deadline for Trustee and the U.S. Trustee to file an objection to discharge shall be  
6 further extended through and including September 5, 2024 ("Extended Deadline"). The Extended  
7 Deadline shall be applicable only to the Trustee and U.S. Trustee and no other party in interest.

8 2. The Stipulation is without prejudice to any further extensions of the deadline to object  
9 to discharge, to be made by further motion or stipulation.

10 3. This Stipulation may be executed in one or more counterparts and facsimile or  
11 electronic signatures may be used in filing this document with the Court.

12 Dated: May \_\_, 2024

MARSHACK HAYS WOOD LLP

13 By: (See previous page for signature)

14 D. EDWARD HAYS  
15 TINHO MANG  
16 Attorneys for Chapter 7 Trustee  
A. CISNEROS

17 Dated: May \_\_, 2024

UNITED STATES TRUSTEE FOR THE  
CENTRAL DISTRICT OF CALIFORNIA,  
REGION 16

18 By: (See previous page for signature)

19 Everett L. Green  
20 Trial Attorney

21 Dated: May 30, 2024

22 By:   
23 SHAMICKA LAWRENCE, Debtor

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **THIRD STIPULATION FOR EXTENSION OF DEADLINE TO OBJECT TO DISCHARGE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 31, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **May 31, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR**

SHAMICKA LAWRENCE  
11364 ESTATES COURT  
RIVERSIDE, CA 92503-0639

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 31, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA OVERNIGHT MAIL**

HONORABLE WAYNE JOHNSON  
UNITED STATES BANKRUPTCY COURT  
3420 Twelfth Street, Suite 384 / Courtroom 304  
Riverside, CA 92501-3819

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 31, 2024  
Date

Chanel Mendoza  
Printed Name

/s/ Chanel Mendoza  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **TRUSTEE: Arturo Cisneros (TR)** amctrustee@mclaw.org, acisneros@iq7technology.com;ecf.alert+Cisneros@titlexi.com
- **INTERESTED PARTY COURTESY NEF: Alan W Forsley** alan.forsley@flpllp.com, awf@fkllawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- **ATTORNEY FOR LAWRENCE CHILDREN'S TRUST UTA MAY 6, 2014: Thomas M Geher** tmg@jmbm.com, bt@jmbm.com;tmg@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY MESSAGE ENFY FRANCHISING: Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **ATTORNEY FOR TRUSTEE: D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR DEBTOR: Marc A Lieberman** marc.lieberman@flpllp.com, safa.saleem@flpllp.com,addy@flpllp.com
- **ATTORNEY FOR TRUSTEE: Tinho Mang** tmang@marshackhays.com, tmang@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com
- **U.S. TRUSTEE: United States Trustee (RS)** ustpreion16.rs.ecf@usdoj.gov